

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIAIn Re: Justina Roonan  
Debtor

Chapter 13

Case No. 20-11810

## AFFIDAVIT OF LAKISHA WELLS

I, LaKisha Wells, am a Bankruptcy Agent for Ally Servicing LLC. Ally Servicing LLC is the authorized servicer for Ally Bank (hereinafter "Creditor") and I am authorized to act as the Creditor's representative. I declare under penalty of perjury that the following is true and correct based upon my personal review of certain business records maintained by Creditor relating to the subject account. That I am informed and believe such business records were made at or near the time by, or from information transmitted by, a person with knowledge, kept in the ordinary course of Creditor's regularly conducted business activity.

1. On August 13, 2018, Justina L Roonan entered into a retail installment sale contract (hereinafter "Contract") with dealer for the purchase of the following collateral: 2013 NISSAN ROGUE VIN JN8AS5MV8DW654575 (hereinafter "Collateral"). The Contract calls for consecutive monthly payments of \$397.56. Dealer thereafter assigned the Contract and title to Creditor, which holds a security interest in the Collateral. True and correct copies of the Contract and title are attached hereto as Exhibits A and B.
2. The fair market value of the Collateral is \$8,550.00.
3. The net payoff owing under the contract, including any accrued late and/or unpaid charges, totals \$18,888.04.
4. Creditor has not been able to verify whether appropriate insurance coverage exists protecting its Collateral, as required by the Contract.
5. The Debtor's Plan provides for payment of Creditor's secured claim directly by Debtor.
6. The Contract is in default and currently due for the June 27, 2020 payment. Contractually, the pre-petition defaults total \$82.89 and the post-petition payment defaults total \$2,611.61. No post-petition payments have been received. The total defaults (pre and post-petition) under the Contract including any accrued late and/or unpaid charges total \$2,694.50.

Dated: January 25, 2021By: LaKisha Wells  
LaKisha Wells